

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-1-E**

IN RE: Annual Review of Base Rates for Fuel                    )  
Costs of Duke Energy Progress, LLC                            )  
  )  
  )  
  )  
  )  
**TO: REBECCA J. DULIN, ESQUIRE, ATTORNEY OF RECORD FOR DUKE ENERGY  
PROGRESS, LLC:**

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, “SCSBA”, pursuant to Reg. 103-833, hereby serves, **Duke Energy Progress, LLC**, (hereinafter as, “DEP”) with SCSBA’s First Requests for Production, to be answered separately within twenty (20) days from the date of service hereof. Please set forth DEP’s answers separately, after restating the question.

This Request for Production shall be deemed continuing, and if complete production to any of them is not presently available, and the information becomes available before trial, supplemental production is required at such time as this information becomes available to Plaintiff.

IF DEP CONTENDS THAT ANY OF THE REQUESTED MATERIAL NEED NOT BE PRODUCED, IDENTIFY SUCH MATERIAL AND SET FORTH THE BASIS FOR DEP’S CONTENTION IN ACCORDANCE WITH RULE 26(b)(5) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

**INSTRUCTIONS**

**IT IS HEREIN REQUESTED:**

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2” x 11” format.
6. That each Request be reproduced at the beginning of the response thereto.

7. That DEP provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require DEP to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of DEP, including information in the possession of DEP or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for DEP's inability to produce.

14. **Please provide copies of the information responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.**

### **DEFINITIONS**

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **"You" or "your" shall refer to, DEP.**
2. **The conjunctions "and" and "or" shall be interpreted** in each and every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.

3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in DEP’s possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of DEP and specifically includes the computer and or laptop computers utilized by Representatives of DEP. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and DEP.

4. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in DEP’s possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

**FIRST REQUEST FOR PRODUCTION**

**(The following is applicable to all Requests. Request is excepting customer-specific communications, forms or applications, bills, contracts, and payment records)**

1. Please provide copies of all documents that You relied upon in completing Your answers to South Carolina Solar Business Alliance, Inc.'s First Set of Interrogatories.
2. Please provide copies of all documents that contain, or can be used to derive or estimate, the fuel costs You incurred during 2017 on an hour-by-hour basis.
3. Please provide copies of all documents You developed during 2017 in conjunction with PROMOD, PROSYM, or any other production cost modeling software, including (but not limited to) the software output showing estimated fuel and other production costs. To the extent feasible, please provide this data in Excel worksheets, or using an Excel-compatible file format, and provide hour-by-hour detail.
4. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on Your fuel costs.
5. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on the timing of Your daily, monthly, seasonal or annual peak system load during any of the years from 2017 through 2032.
6. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on the magnitude of Your daily, monthly, seasonal or annual peak system load (e.g. net of solar generation) during any of the years from 2017 through 2032.
7. Please provide copies of all documents related to potential changes to Your fuel costs or system operations in response to increased amounts of solar energy, including but not limited to changes relating to "ramp rates" of existing base load generating units, changes relating to the operation of Your pumped storage units, changes to off-system power purchases and sales, and changes that could have the effect of increasing or decreasing Your fuel costs or improving operational efficiency under circumstances where solar energy provides an increased share of the overall resource mix.
8. Please provide copies of all documents related to Your records and forecasts of the impact of a "Duck Curve" on Your system, including (but not limited to) the impact on Your fuel costs, the impact on Your avoided energy costs and the impact on Your avoided capacity costs.

9. Please provide copies of all documents in your possession related to the impact of the Bad Creek Pumped Storage Hydroelectric Station on Your current or future fuel costs.

10. Please provide copies of all documents in your possession related to Your plans to upgrade the Bad Creek Pumped Storage Hydroelectric Station including (but not limited to) the most current available estimate of the cost of upgrading the station and the resulting reduction in Your fuel costs or other benefits that You anticipate achieving by undergoing this upgrade.

11. Please provide copies of all documents related to Your records and forecasts of the impact of cooling degree days on Your system load or fuel costs, including (but not necessarily limited to) any documents showing hourly or daily summer temperatures within DEP's service territory during 2014-2018 or any portion thereof.

12. Please provide copies of all documents related to Your records and forecasts of heating degree days as they pertain to Your system load or fuel costs, including (but not necessarily limited to) any documents showing hourly or daily winter temperatures within DEP's service territory during 2014-2018 or any portion thereof.

13. Please provide copies of all documents used by You to evaluate the relationship between weather conditions and Your generation dispatch or fuel costs, including (but not limited to) the extent to which forecasted cooling degrees or forecasted weather conditions influence Your plans for dispatching generating units to meet system load.

14. Please provide copies of all documents used by You to determine the correlation between variations in system load and variations in solar generation, including (but not limited to) the tendency for solar generation to decrease on days with heavy cloud cover and the tendency for cloud cover to reduce ambient temperatures.

15. Please provide copies of all documents related to Your records and forecasts relating to the relationship between solar name plate capacity and energy output including, (but not limited to) Your forecasts or planning of fuel purchases, Your forecasts of system load net of solar energy injected into Your system, or Your 2017 or 2018 integrated resource plan (IRP).

16. Please provide copies of all documents used by You to determine the relationship between solar output and system load, including but not limited to any documents showing the metered output of individual solar facilities on specific hours of specific days.

17. Please provide copies of all documents related to Your records and forecasts relating to growth in utility scale solar on Your system, including (but not limited to) documents relating to the rate of growth during specific time periods, documents related to the amount of energy DEP anticipates receiving from utility scale solar projects during specific years (or other time periods), and documents indicating what portion of the projects in your interconnection queue that You anticipate will be completed or withdrawn, and documents related to the impact of these projects on Your fuel costs (but excepting project-specific communications, applications, bills, contracts, and payment records).

18. Please provide a copy of all documents relating to alternatives to combined cycle plants that You are considering, or have considered, while developing your 2018 Integrated Resource Plan, including (but not limited to) firm purchases, acquisition of other types of generating capacity, and Demand Side Management, and including any documents related to Your records or forecasts of the impact of these alternatives on your fuel costs.

19. Please provide copies of all documents You used or relied upon during 2017 to estimate Your avoided energy costs pursuant to the Public Utility Regulatory Policies Act of 1978 ("PURPA").

20. Please provide copies of all documents You used or relied upon during 2017 to estimate Your avoided capacity costs pursuant to PURPA.

21. Please provide copies of all documents that contain Your hourly system load data for the year 2016, including (but not necessarily limited to) the data submitted by DEP on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

22. Please provide copies of all documents that contain DEP's hourly system load data for the year 2017, including (but not necessarily limited to) the data required to be submitted by DEP on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

23. Please provide copies of all documents that contain DEP's hourly system load data for 2018 (or any portion thereof), including (but not necessarily limited to) the data DEP anticipates will be submitted by DEP on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

24. Please provide a copy of all discovery requests submitted to you by ORS, or other parties to this proceeding.

25. Please provide a copy of your responses to all discovery requests submitted to you by ORS, or other parties to this proceeding, including all documents or other attachments that were provided, or made available, in conjunction with your response.

/s/

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Counsel for South Carolina Solar Business Alliance,  
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May 11, 2018

Columbia, South Carolina